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Defendant.

STIPULATION FOR PROTECTIVE ORDER

The parties state as follows:

1 1. Protected Documents which will be used by the government in its case in chief
2 include personal identifiers, including social security numbers, dates of birth, and addresses of
3 participants, witnesses and victims in this case.

4 2. Discovery in this case exceeds 30,000 pages. Given the nature of the allegations
5 and the facts and circumstances surrounding the crimes with which the defendants are charged,
6 that is, the defendants assumed the identities of hundreds of persons other than themselves in
7 order to fraudulently file tax returns and collect refunds, many of the documents in the
8 discovery necessarily include personal identifiers. Redacting the personal identifiers of
9 participants, witnesses, and victims would prevent the timely disclosure of discovery to the
10 defendants.

11 3. The United States agrees to provide Protected Documents without redacting the
12 personal identifiers of participants, witnesses, and victims.

13 4. Access to Protected Documents will be restricted to persons authorized
14 (authorized person) by the Court, namely the defendant, attorney(s) of record and attorneys'
15 paralegals, investigators, experts, secretaries, file clerks, law clerks, contractors, vendors, IT
16 Department, and copy centers employed by the attorney(s) of record or performing on behalf of
17 defendant.

18 5. The following restrictions will be placed on defendant, defendant's attorney(s)
19 and the above-designated individuals unless and until further ordered by the Court. Defendants,
20 defendants' attorneys and the above-designated individuals shall not:

21 a. make copies for or allow copies of any kind to be made by any other
22 person of the Protected Documents;

23 b. allow any other person to read the Protected Documents; and
24

1 c. use the Protected Documents for any other purpose other than preparing
2 to defend against the charges in the Indictment or any further superseding indictment arising out
3 of this case.

4 6. Defendant's attorneys shall inform any person to whom disclosure may be made
5 pursuant to this Order of the existence and terms of this Court's Order.

6 7. The requested restrictions shall not restrict the use or introduction as evidence of
7 discovery documents containing personal identifying information such as social security
8 numbers, drivers' license numbers, dates of birth, and addresses during the trial of this matter.

9 8. Upon conclusion of this action, defense counsel shall return to government
10 counsel or destroy and certify to government counsel the destruction of all discovery documents
11 containing personal identifying information such as social security numbers, drivers' license
12 numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty-days after
13 the last appeal is final.

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16 DANIEL G. BOGDEN
17 United States Attorney

18 /s/ Kathryn C. Newman
19 KATHRYN NEWMAN
Assistant United States Attorney

12/16/15
DATE

20 
21 RICHARD WRIGHT, ESQ.
22 Counsel for Ronald Kelly
23
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12/16/15
DATE

ORDER

IT IS SO ORDERED this 28th day of December, 2015.



RICHARD F. BOULWARE, II
United States District Judge